

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SUZANNE GREENE,

Plaintiff,

vs.

TYLER TECHNOLOGIES, INC.,

Defendant.

Civil Action No. 1:19-cv-1338-AT

**JOINT MOTION FOR SETTLEMENT CONFERENCE BEFORE
MAGISTRATE JUDGE AND STAY OF PROCEEDINGS PENDING
RESOLUTION OF SETTLEMENT CONFERENCE**

Plaintiff Suzanne Greene (“Plaintiff”) and Defendant Tyler Technologies, Inc. (“Defendant”) (collectively, “the Parties”) respectfully request that the Court: (1) refer this action to the United States Chief Magistrate Judge for assignment to the next available Magistrate Judge to conduct a settlement conference; and (2) stay all proceedings, including the current December 18, 2019 deadline for dispositive motions, pending the completion of the settlement conference. In support of this Motion, the Parties state as follows:

1. Plaintiff filed her Complaint [DE 1] on March 26, 2019, raising claims pursuant to the Fair Labor Standards Act (“FLSA”). Defendant filed its Answer [DE 10] on April 16, 2019.

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2. Counsel for the Parties have engaged in preliminary informal discussions regarding an attempted resolution of this action.

3. The Parties agree that the assistance of a Magistrate Judge would facilitate settlement negotiations and respectfully request that the Court refer this case to the United States Chief Magistrate Judge for assignment to the next available Magistrate Judge to conduct a settlement conference in the next forty-five (45) days.

4. In order to assist the Parties' settlement discussions and to best position this case for resolution, the Parties also respectfully request that the Court stay all deadlines in this action, including the December 18, 2019 deadline for filing dispositive motions, pending the outcome of the settlement conference.

5. In the event the settlement conference is unsuccessful, the Parties will submit a joint notification to the Court within five (5) business days informing the Court that the case was not resolved, and the deadline for filing dispositive motions will be set for thirty (30) days from the Parties' notice to the Court.

6. If a settlement is reached at the settlement conference, the Parties will submit a joint notification to the Court within five (5) business days informing the Court that the matter has been resolved and will provide a date by which the final settlement agreement will be executed and an agreed dismissal filed.

7. The Parties are not filing this Motion for purposes of undue delay or to otherwise frustrate efficient resolution of this matter. Rather, the Parties' goal is to direct their resources—and to prevent the waste of the Court's resources—to determine whether an agreed resolution of this matter is possible.

8. The Parties agree that neither side shall be prejudiced by the Court's approval of the requested referral, stay, and corresponding extension of the dispositive motion deadline.

WHEREFORE, the Parties respectfully request that the Court: refer this matter to the United States Chief Magistrate Judge for assignment to a Magistrate Judge to conduct a settlement conference within the next forty-five (45) days; stay all proceedings in the case pending the outcome of the settlement conference; and should the matter not be resolved at the settlement conference, set the deadline for filing dispositive motions for thirty (30) days from the Parties' notice to the Court of the outcome of the settlement conference. A Proposed Order granting this Motion is attached for the Court's convenience.

Respectfully submitted, December 2, 2019.

/s/ Matthew W. Herrington

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